EXHIBIT 6

Document 106-7

#: 3236

WellcomeMat, LLC v. Aylo Holdings S.à r.l., et al., No. 2:23-cv-483 (E.D. Tex.) Infringement of U.S. Patent No. 8,307,286 B2

This chart shows, on an element-by-element basis, how Aylo Holdings S.à r.l., Aylo Freesites, Ltd., Aylo Premium, Ltd., 9219-1568 Quebec, Inc. (together, the "Aylo Defendants"), and Jarrod Beltran ("Beltran," and with the Aylo Defendants, "Defendants") infringe Claims 13, 14, 15, 18, 19, and 20 of U.S. Patent No. 8,307,286 B2 (the "'286 Patent") through the making, using, offering for sale, or sale in the United States, and/or importation into the United States, of various products and offerings, including the Aylo Defendants' Action Tag functionality (the "Accused Products"), as well as any other products that the Aylo Defendants make, use, offer for sale, or sell in the United States, and/or import into the United States that operate in the manner set forth below.

§ 271(b) by taking active steps to encourage and facilitate direct infringement by the Aylo Defendants in the United States, through the that his efforts would result in the direct infringement of the '286 Patent. For example, Beltran took active steps to encourage the Aylo of such actions include Beltran's uploaded video titled, "See how Ivy Hale . . . before she . . . on it," in which he uses the Aylo Defendants' Action Tag functionality at the 01:00 mark and one at the 02:32 mark. https://www.pornhub dissemination of video content on Porhub.com that uses the Aylo Defendants' Accused Products with knowledge and the specific intent Defendants to use and offer for use the Accused Products in the United States in a manner that would directly infringe each element as described below, including by uploading video content that uses and markets the functionality of Action Tags. Non-limiting examples infringement of the '286 Patent by the Aylo Defendants by distributing video content that uses and markets for use the Accused Products WellcomeMat, LLC ("WellcomeMat") further states that Beltran also indirectly infringes each asserted claim in violation of 35 U.S.C. .com/view video.php?viewkey=6527f2d910d59 (explicit text omitted). Beltran thus induced, and continues to actively induce, the direct and by failing to remove the infringing video content. WellcomeMat further notes that this chart contains an exemplary, non-limiting description of Defendants' infringement that is representative of how each Accused Product infringes the '286 Patent. WellcomeMat further notes that it makes these contentions based on the information reasonably available to it at this time because discovery has not commenced, and because Defendants have not provided any documents concerning their infringement. Further, the Court has yet to issue its claim construction rulings. WellcomeMat thus reserves the right to modify, supplement, and/or amend these contentions as additional evidence and information become available, including in light of discovery, invalidity, prior art, claim construction, or any information provided by Defendants or any other party or non-party to this action.

difference between the elements of the asserted claims and the corresponding functionality in the accused instrumentality, i.e., the As demonstrated below, WellcomeMat contends that each element of each asserted claim is literally infringed by the Accused Products. WellcomeMat further contends that, to the extent that any particular element is shown not to be met literally by the Accused Products, each Accused Product infringes under the doctrine of equivalents for the reasons set forth below because there would be no substantial

corresponding functionality in the Accused Products does substantially the same thing, in substantially the same way, to achieve substantially the same result(s) as the claimed elements. Document 106-7 #: 3238

	Claim 13
13. [Pre] A method for handling video cue points, the method comprising:	The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo Defendants to perform, a method for handling video cue points—particularly indexed time positions or tags associated with video data.
	For example, the Aylo Defendants operate a number of websites, including Pornhub, Pornhub Premium, YouPorn, YouPorn Premium, RedTube, Redtube Premium, Tube8, Thumbzilla, ModelHub, XTube, Brazzers, MOFOS, Babes.com, Twistys, Men.com, RealityKings.com, and DigitalPlayground.com.
	As described in the Aylo Defendants' "Pornhub Playbook," these websites adhere to a common revenue generating model: they solicit and display content from "content partners" and then display this content for free to generate advertising revenue or on a subscription or pay-per-view basis, which also additionally generates advertising revenue.

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importance of utilizing certain functionality enabled by the Aylo Defendants' platforms, including As part of this process of soliciting and displaying such content, the Aylo Defendants emphasize the appropriate "tags":

PART 2 VIDEO OPTIMIZATION

During the upload process, you will be afforded the opportunity to further format the way your content will be presented to the users. Vell-formed titles, tags and categories will help increase views by allowing users to find your videos in search results. Rather than attempting to appeal to the broadest range of viewers, your goal should be to target the demographic that will be most interested in your niche(s).

https://www.pornhub.com/content_partner_guide.pdf.

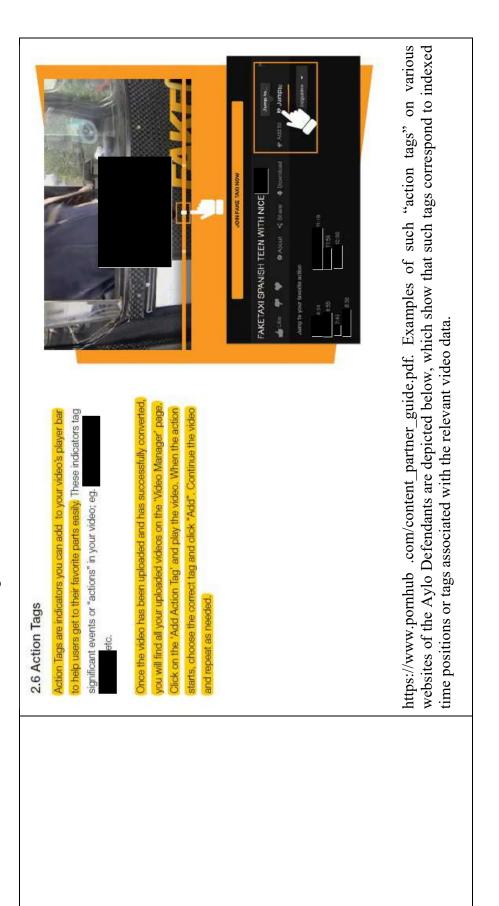
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In particular, the Aylo Defendants emphasize the importance of content partners applying what the Aylo Defendants describe as "action tags," which they explain are "indicators you can add to your video's player bar to help users get to their favorite parts easily."

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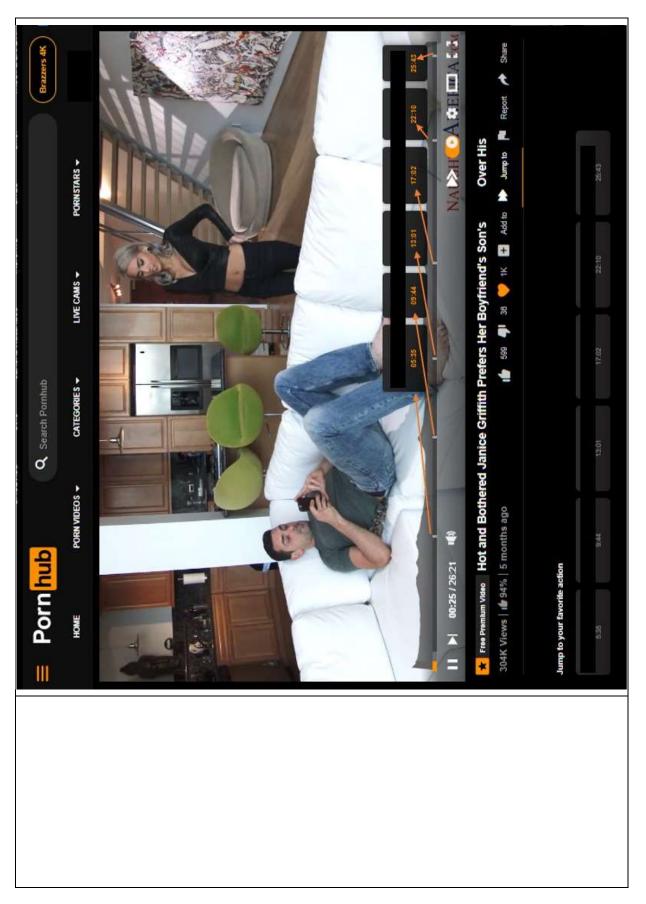
WellcomeMat, LLC v. Aylo Holdings S.à r.l., et al., No. 2:23-cv-483 (E.D. Tex.) Infringement of U.S. Patent No. 8,307,286 B2

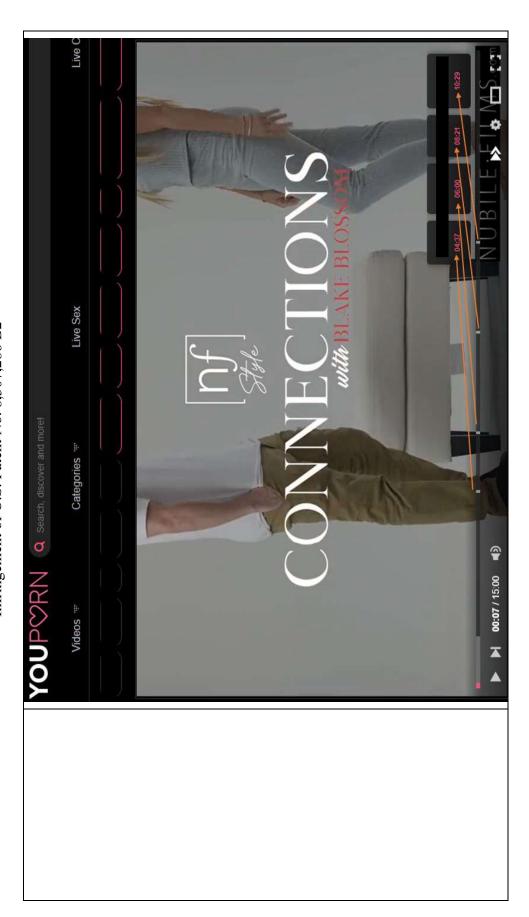


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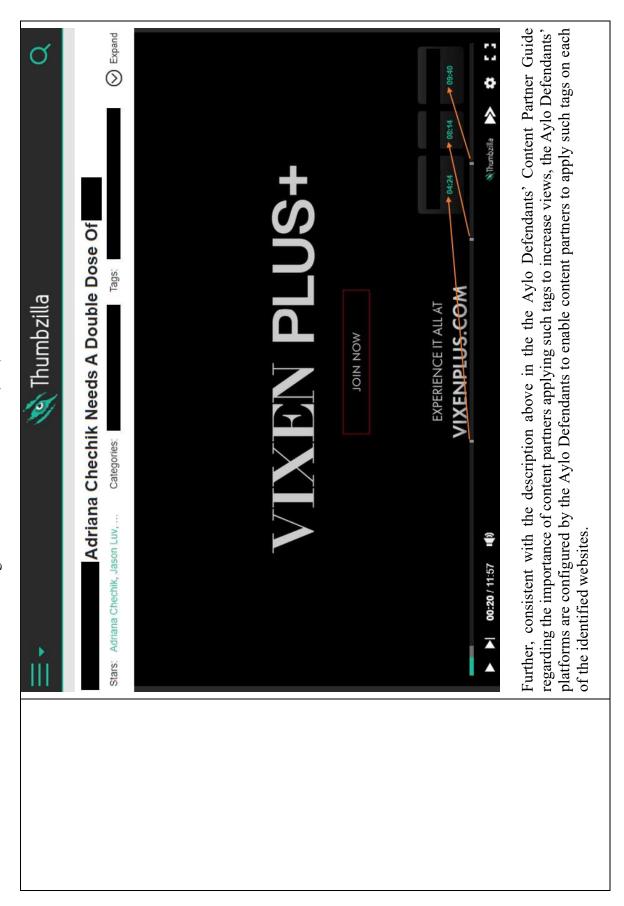


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For example, the below screenshot from the Aylo Defendants' Content Partner Guide describes the

functionality enabled by the Video Manager function on the platforms. Porn hub Network

3.3 Video Manager

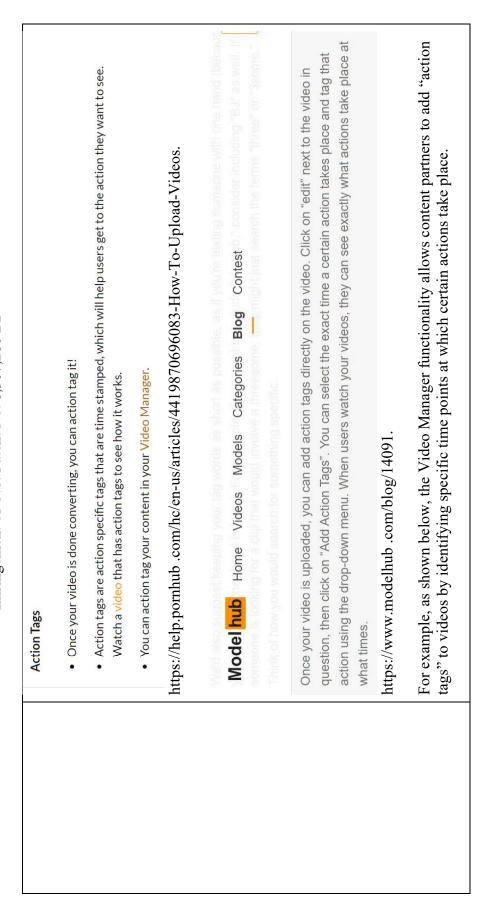
The video manager allows you to study and analyze ratings and the view count data for each of your videos. Statistics for each video also show how many times your video was added to favorites, how many comments it has received as well as how many playlists it appears in.

Simply login to your account and select Video Manager from your profile dropdown. Here, all of your videos are listed with the option of viewing stats for each clip by Daily or Cumulative.

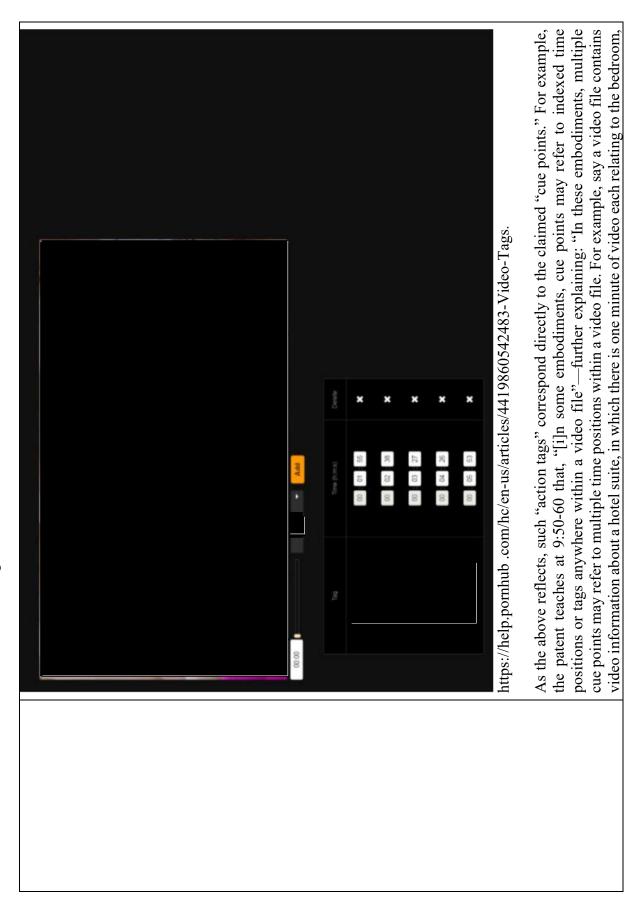
These stats can be exported (by clicking the "Download Stats" button) as a CSV file and opened by any spreadsheet program such as Excel. This is a great way to analyze how viewers are responding to your content.



https://www.pornhub.com/content_partner_guide.pdf. And the below screenshots demonstrate that this Video Manager is configured by the Aylo Defendants to allow content partners to apply such tags, including at selected time intervals.



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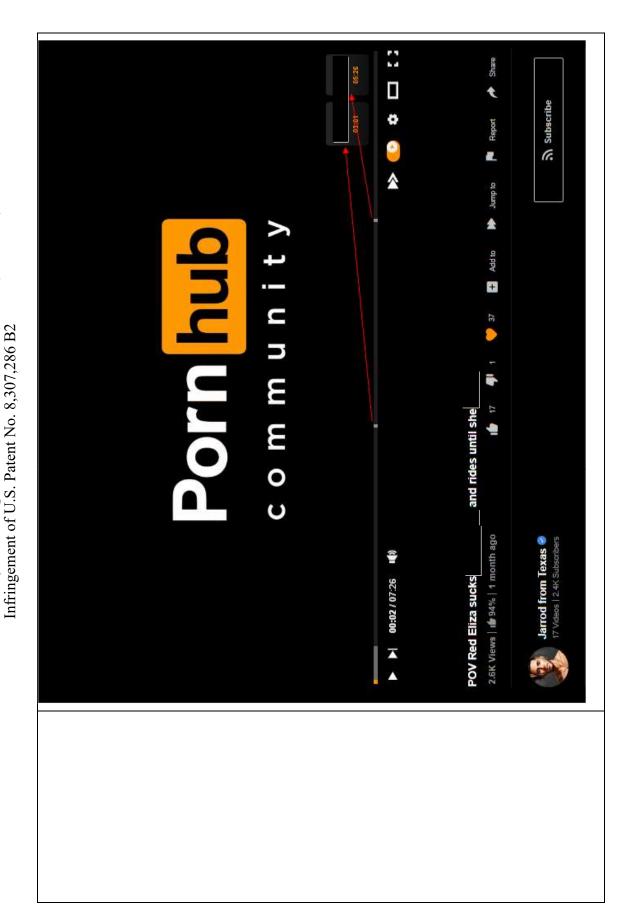


bathroom, living room, and kitchenette. In this example, four cue points may be associated with the video
file, pointing to time positions at zero, one, two, and three minutes, and essentially providing chapter
markers for the different sections of the video."

a method for handling such video cue points. This is consistent with the patent's disclosure at 8:19-29 and 51-61, which teaches that that a "Video Editing Environment (VEE) 116 and/or a Video Playback Environment (VPE) 118 . . . may comprise or be in communication with a cue point handler 120," and Further, the Aylo Defendants' platforms provide the mechanism that the Aylo Defendants use to perform that "the cue point handler 362 may allow the client to add or edit the cue point information associated with the video file."

Beltran has applied action tags to videos he uploads onto Pornhub through Aylo Defendants' Video Recognizing the benefits of Aylo Defendants' Action Tag functionality, as depicted below, Defendant Manager environment, thereby causing and actively inducing the direct infringement of the '286 Patent by the Aylo Defendants.

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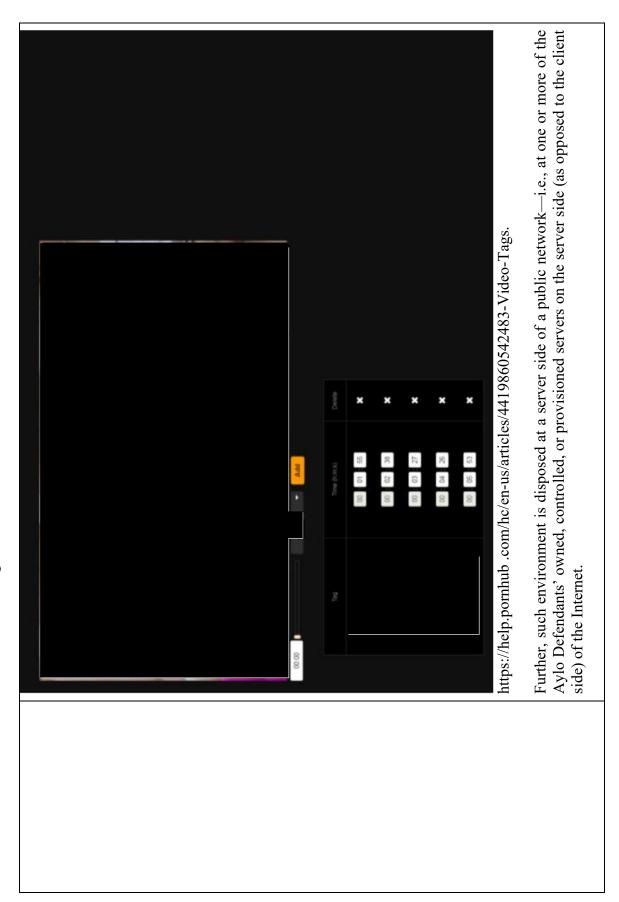


| 13.1 | providing a computer system having at least one computer-readable medium comprising a video editing environment, and being disposed at a server side of disposed at a public network;

The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo Defendants to perform, a method for handling video cue points comprisising providing a computer system having at least one computer-readable medium comprising a video editing environment, and being disposed at a server side of a public network.

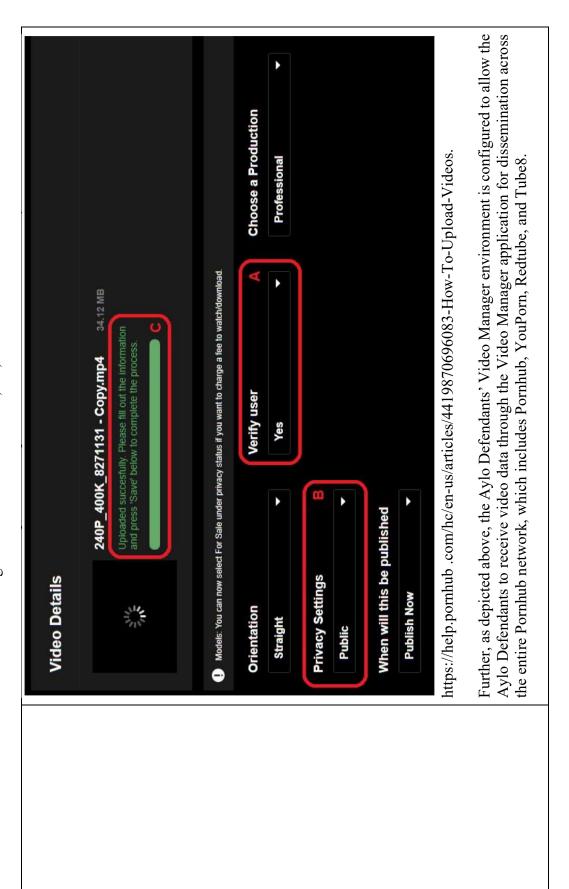
readable medium comprising a video editing environment—for example, the Aylo Defendants' Video As demonstrated above, the Aylo Defendants provide a computer system having at least one computer-Manager video editing environment:

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[13.2] receiving a set of video information at the video editing environment using the computer system:	The accused Aylo Defendants platforms each are configured to perform, and are used by Aylo Defendants to perform, a method for receiving a set of video information at the video editing environment using the computer system. Such video information includes, but is not limited to, video data.
	For example, as depicted above and further demonstrated below, the Aylo Defendants' Video Manager environment is configured to allow the Aylo Defendants to receive video data through the Video Manager application.
	 How to upload videos
	Uploading content to Pornhub is easy!
	• Click on the upload button (next to the search bar on desktop)
	Choose a video to upload
	Give your content good metadata
	• Verify that you're in the video (A). The account holder must be present in the video in order to monetize from it.
	*In order for the video to be eligible for earnings, the main account holder must be in the uploaded video.

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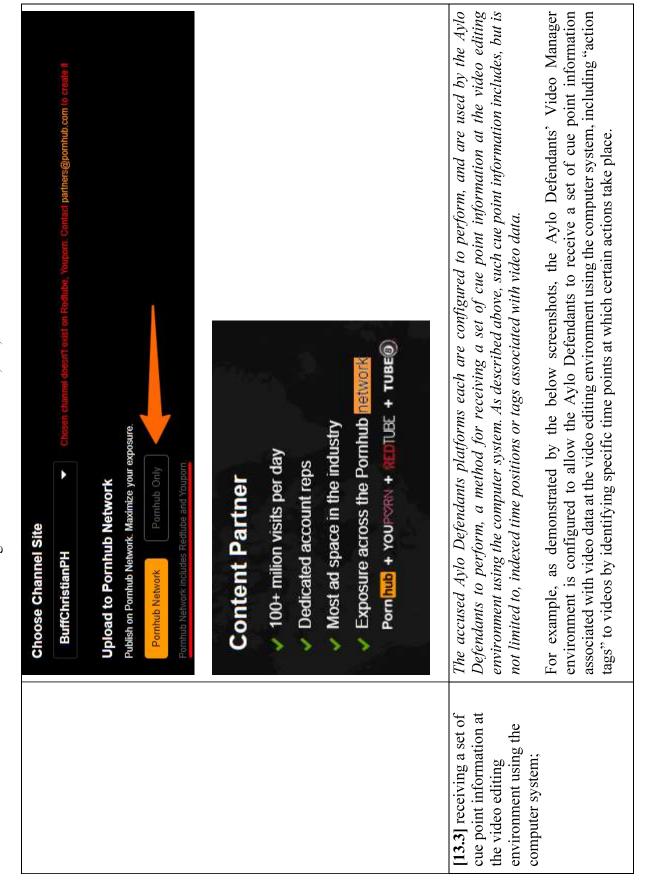


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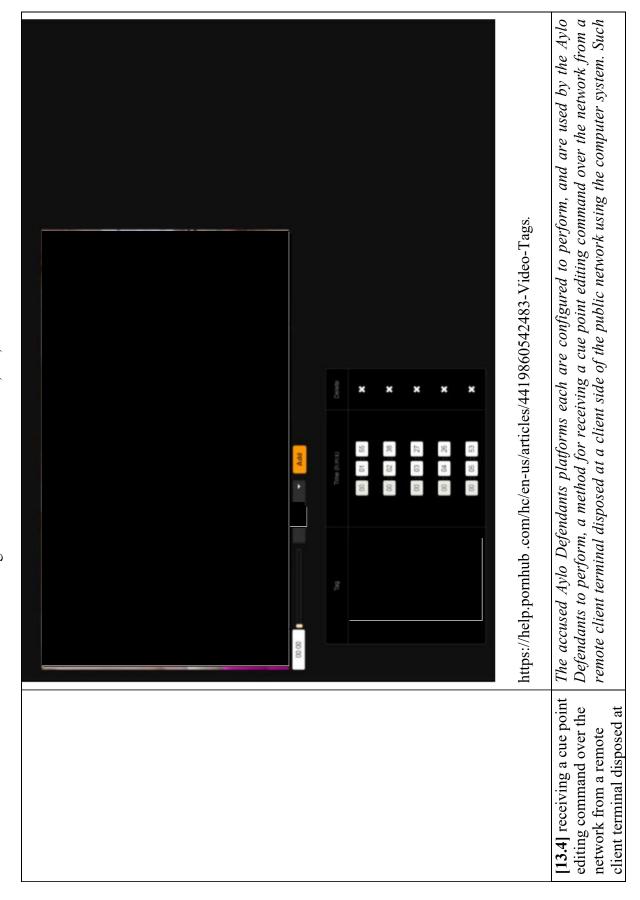


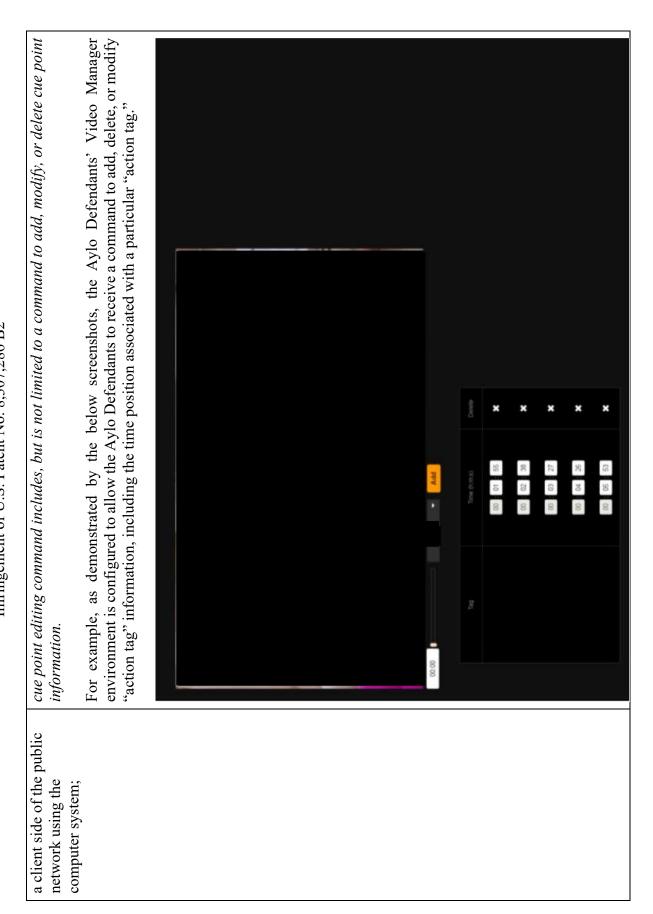
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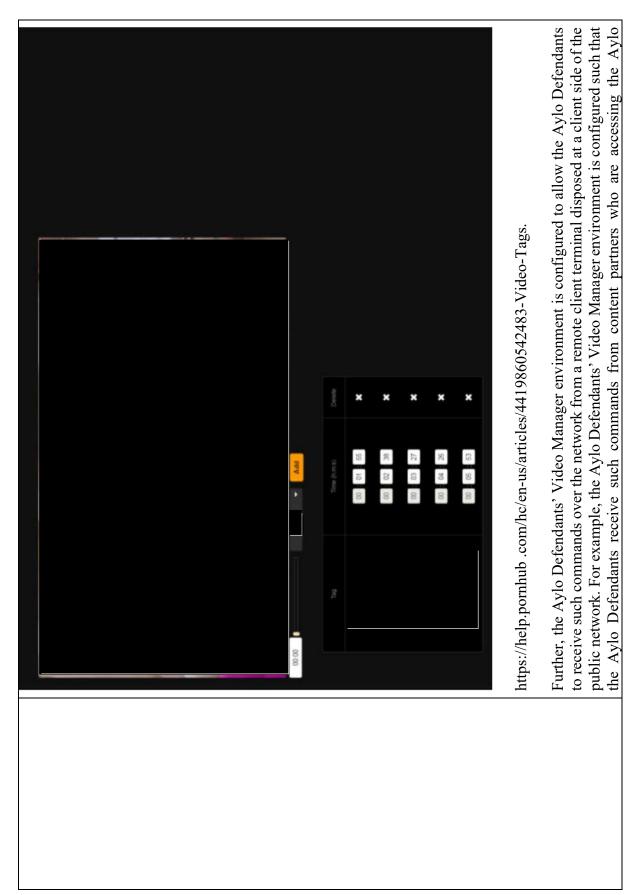
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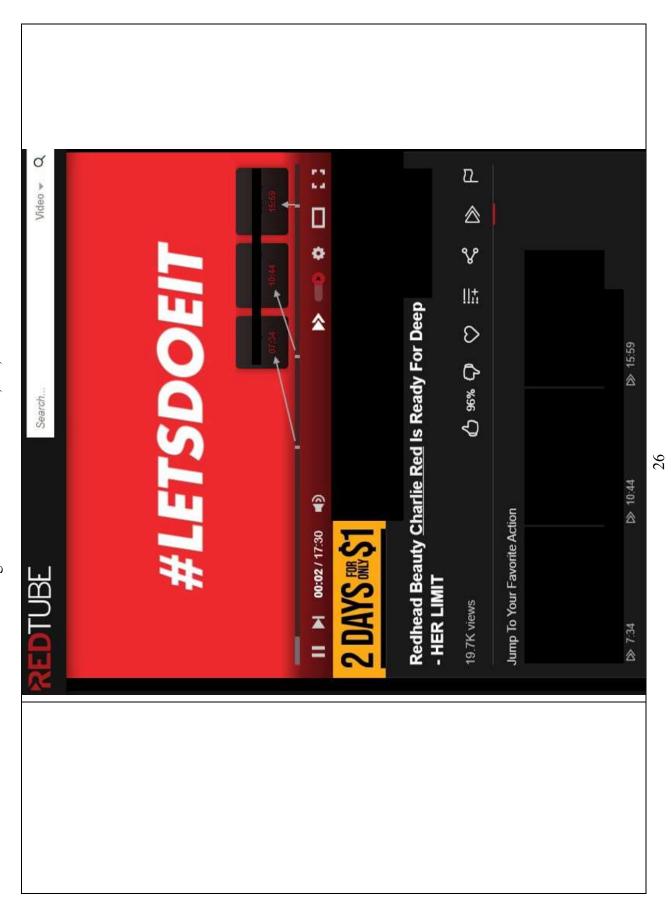
	https://help.pornhub.com/hc/en-us/articles/4419860542483-Video-Tags.
	Further, the Aylo Defendants' Video Manager environment is configured to allow the Aylo Defendants to receive such commands over the network from a remote client terminal disposed at a client side of the public network. For example, the Aylo Defendants' Video Manager environment is configured such that the Aylo Defendants receive such commands from content partners who are accessing the Aylo
	Defendants' Video Manager environment remotely from a location other than the location of the Aylo Defendants' owned or controlled server.
[13.5] modifying a portion of the cue point	The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo Defendants to perform, a method for modifying a portion of the cue point information at the server side
information at the server side of the public network	of the public network according to the cue point editing command received over the public network from the client terminal. As described above, such cue point information includes, but is not limited to, indexed
according to the cue point editing command received	time positions or tags anywhere associated with video data, and modifying cue point information may include, but is not limited to, changing various attributes of an existing cue point (e.g. the cue point's
over the public network from the client terminal;	name or time position), changing the associations between an existing cue point and either video data or other cue point information, or any other useful type of modification to cue point information.
	For example, as demonstrated by the below screenshots, the Aylo Defendants' Video Manager environment is configured to allow the Aylo Defendants to receive a command to modify cue point information, including to change the time position associated with a particular "action tag."

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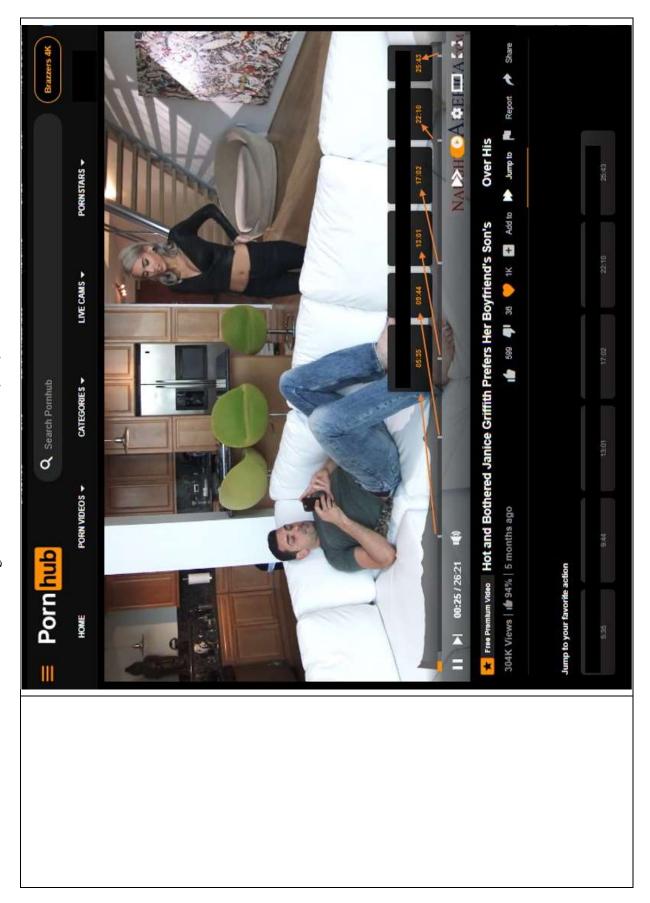


	Defendants' Video Manager environment remotely from a location other than the location of the Aylo Defendants' owned or controlled server.
[13.6] receiving a cue point selection over the network from the remote client terminal identifying one of the cue points	The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo Defendants to perform, a method for receiving a cue point selection over the network from the remote client terminal identifying one of the cue points corresponding to a portion of the video information of one of the video files.
corresponding to a portion of the video information of one of the video files; and	For example, as demonstrated by the below screenshots, the Aylo Defendants' platforms are configured such that the remote client terminal can select one of the "action tag," locations corresponding to the corresponding portion of video data. Upon selecting such "action tag," the client terminal can navigate to and/or "jump" to and begin to stream the video information corresponding to the selected "action tag,":
	Action Tags
	Action Tags are indicators you can add to your video's player bar to help users get to their favorite parts easily. These indicators tag significant events or "actions" in your video; eg.
	Once the video has been uploaded and has successfully converted, you will find all your uploaded videos on the 'Video Manager' page. Click on the 'Add Action Tag' and play the video. When the action starts, choose the correct tag and click "Add". Continue the video and repeat as needed.
	https://help.pornhub.com/hc/en-us/articles/4419860542483-Video-Tags.

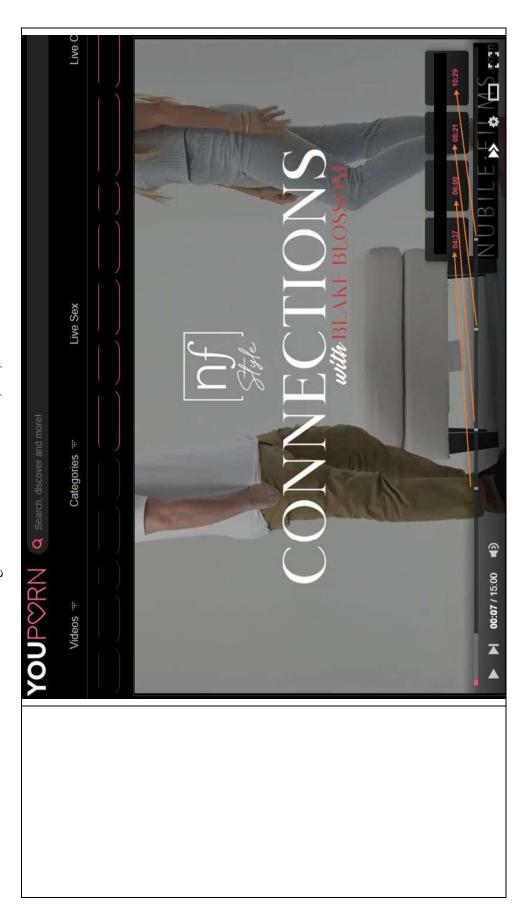
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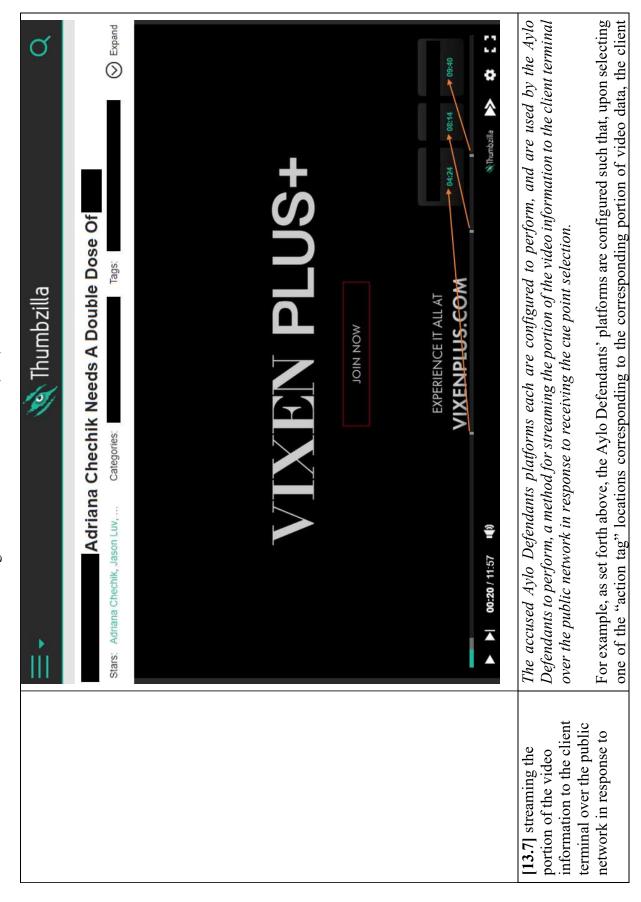


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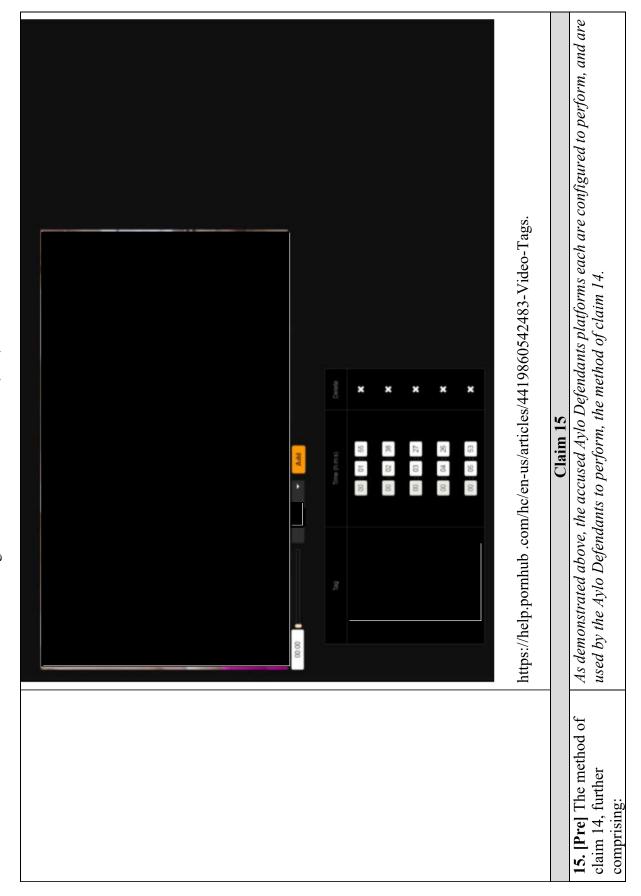
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receiving the cue point selection.	terminal can navigate to and/or "jump" to and begin to stream the video information corresponding to the selected "action tag."
	Claim 14
14. The method of claim	The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo
13, further comprising	Defendants to perform, the method of claim 13, further comprising providing a cue point editing mode
providing a cue point	as part of the video editing environment configured to perform at least one of creating, modifying,
editing mode as part of the	deleting, or interpreting at least a portion of the set of cue point information according to the cue point
video editing environment	editing command received over the public network from the client terminal.
configured to perform at	
least one of creating,	For example, as demonstrated above, the accused Aylo Defendants platforms each are configured to
modifying, deleting, or	perform, and are used by the Aylo Defendants to perform, the method of claim 13.
interpreting at least a	
portion of the set of cue	Further, as demonstrated by the below screenshots, the Aylo Defendants' Video Manager contains an
point information	"action tag" editing mode as part of its Video Manager functionality that is configured to enable content
according to the cue point	partners to perform at least one of creating, modifying, deleting, or interpreting at least a portion of the
editing command received	set of "action tag" information received over the public network from the client terminal.
over the public network	
from the client terminal.	

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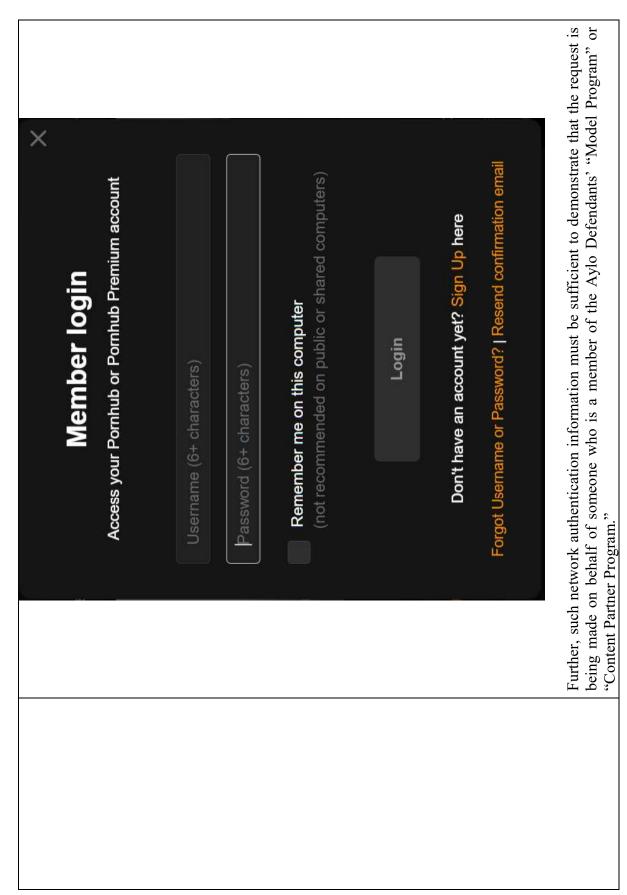


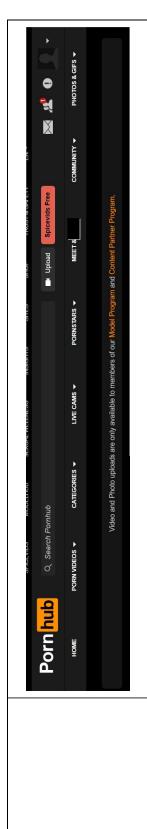
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mode entry signal over the network from the client terminal representing entry into the cue point edit mode, and	The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo Defendants to perform, the method of claim 14, further comprising receiving an edit mode entry signal over the network from the client terminal representing entry into the cue point edit mode. For example, as demonstrated by the below screenshot, the Aylo Defendants' Video Manager is configured to receive an "Add Action Tag" edit mode entry signal that prompts it to enter the described "action tag" edit mode through which content partners can perform at least one of creating, modifying, deleting, or interpreting "action tag" information. Action Tags Action Tags Action Tags Action Tags Action Tags Action Tags Action Tags are indicators you can add to your video's player bar to help users get to their favorite parts easily. These indicators tag significant events or "actions" in your video; eg
[15.2] switching the video editing environment to the cue point editing mode in response to receiving the edit mode entry signal.	The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo Defendants to perform, the method of claim 14, further comprising switching the video editing environment to the cue point editing mode in response to receiving the edit mode entry signal. For example, as demonstrated by the below screenshot, the Aylo Defendants' Video Manager is configured to receive an "Add Action Tag" edit mode entry signal that prompts it to enter the described "action tag" edit mode through which content partners can perform at least one of creating, modifying, deleting, or interpreting "action tag" information.

	Action Tags
	Action Tags are indicators you can add to your video's player bar to help users get to their favorite parts easily. These indicators tag significant events or "actions" in your video; eg.
	Once the video has been uploaded and has successfully converted, you will find all your uploaded videos on the 'Video Manager' page. Click on the 'Add Action Tag' and play the video. When the action starts, choose the correct tag and click "Add". Continue the video and repeat as needed.
	https://help.pornhub.com/hc/en-us/articles/4419860542483-Video-Tags.
	Claim 18
18. The method of claim	The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo
13, further comprising	Defendants to perform, the method of claim 13, further comprising receiving, over the network,
receiving, over the	authentication information relating to access authority of the remote client terminal.
network, authentication	
information relating to	For example, to allow access to the Aylo Defendants' Video Manager functionality, the Aylo
access authority of the	Defendants' platforms require that a remote client terminal "log in" as a "Member."
remote client terminal.	

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Claim 19

denying or allowing access editing environment based to all or part of the video 19. The method of claim 18, further comprising access authority of the remote client terminal. at least in part on the

Defendants to perform, the method of claim 18, further comprising denying or allowing access to all or The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo part of the video editing environment based at least in part on the access authority of the remote client terminal.

For example, as demonstrated above, the accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo Defendants to perform, the method of claim 18.

environment requires that the access request is being made on behalf of someone who is a member of network authentication information sufficient to demonstrate that the request is being made on behalf of Further, as demonstrated below, to allow access to the Aylo Defendants' Video Manager functionality, the Aylo Defendants' platforms require that a remote client terminal "log in" as a "Member" with someone who is a member of the Aylo Defendants' "Model Program" or "Content Partner Program." When such information is not received, the Aylo Defendants' platforms are configured to, and do, deny access to the video editing portion of the Video Manager environment—noting that access to such the Aylo Defendants' "Model Program" or "Content Partner Program."



Further, as demonstrated below, Aylo Defendants' platforms provide certain access to the video editing environment based on whether a video editor has the access authority of a content moderator, who may add, delete, or modify cue points of other content parters' videos.

Once your video is uploaded, you can add action tags directly on the video. Click on "edit" next to the video in question, then click on "Add Action Tags". You can select the exact time a certain action takes place and tag that action using the dropdown menu. When users watch your videos, they can see exactly what actions take place at what times.

Do not tag pomstars or models that do not appear in your videos; this will give the impression that you are a spam or scam

f our moderation team finds the lags or calegories chosen to be inaccurate, appropriate tags and categories will be added to improve user experience

https://www.pornhub.com/blog/crash-course-how-to-use-metadata-tags-categories.

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The accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo Defendants to perform, the method of claim 13, wherein the server video data is streamed progressively to a video playback environment at the remote client terminal, allowing the video player to begin displaying streamed server video data while remaining server video data continues to be streamed.

For example, as demonstrated above, the accused Aylo Defendants platforms each are configured to perform, and are used by the Aylo Defendants to perform, the method of claim 13.

streamed server video data

to begin displaying

the remote client terminal, allowing the video player

playback environment at

progressively to a video

20. The method of claim

13, wherein the server video data is streamed video data continues to be

streamed

while remaining server

Further, as demonstrated below, the Aylo Defendants advertise that Pornhub is a "content streaming platform" (https://www.pornhub .com/view_video.php?viewkey=ph626add321fdf6 at 00:12-00:15) that, as shown by the grey progress bar in the screenshots below, progressively downloads and/or streams video data to one or more video playback environments at one or more remote client terminals and thus allows the video player to select and begin displaying streamed server video data while remaining server video data continues to be streamed.

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